

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA,

v.

JOAN RUGGIERO,

Defendant

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Case No. 1:13-CR-10252-WGY

**ASSENTED TO MOTION TO ENLARGE CONDITIONS OF RELEASE**

NOW COMES the Defendant Joan Ruggiero, by and through undersigned counsel and respectfully requests this Court enlarge the Conditions of Release to include travel to the State of New Jersey. As reasons therefore, the Defendant states as follows:

1. Joan Ruggiero has been charged with conspiracy to commit wire fraud in violation of 18 U.S.C. §§ 371 & 1343, and the matter is currently pending in the United States District Court;

2. Ms. Ruggiero is on Pretrial Release on personal recognizance secured by a bond in the amount of Thirty Thousand Dollars (\$30,000.00) and has appeared for all hearings in this matter;

3. Ms. Ruggiero respectfully requests permission to travel to Freehold, New Jersey for a wedding and vacation from September 27, 2013 until September 30, 2013. She has supplied the United States with the information where she is staying and has no United States passport;

4. Pre-trial Services Officer September L. Brown has indicated that Pretrial Services has no objection to this request;

5. The Assistant United States Attorney in this matter, Eric P. Christofferson, expressly assents to this motion based upon the conditions listed above.

JOAN RUGGIERO

By her attorney,

/s/Raymond Sayeg  
Raymond Sayeg, Esq.  
Krattenmaker O'Connor & Ingber  
P.C.  
One McKinley Square, 5<sup>th</sup> Floor  
Boston, MA 02109  
(617) 523-1010  
(BBO NO. 555437)

Dated: September 16, 2013

**CERTIFICATE OF SERVICE**

I, Raymond Sayeg, hereby certify that on this 16th day of September, 2013, that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies of the documents will be sent to those indicated as non-registered participants on September 16, 2013.

s/ Raymond Sayeg  
Raymond Sayeg